



U.S. Department of Justice
United States Attorney
District of New Jersey

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Via E-Mail

The Honorable André M. Espinosa
United States Magistrate Judge
Martin Luther King Building
and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *United States v. Richard Sharp a/k/a "Famous Richard"*
Crim No. 24-789 (CCC)

Dear Judge Espinosa:

This Court is scheduled to hear the initial appearance of Richard Sharp, also known as "Famous Richard" ("Sharp" or the "Defendant"). In advance of this appearance, this letter highlights the key reasons the Government opposes bail for Sharp. There are no conditions, nor combination of conditions, that can reasonably assure the safety of the community. Therefore, the Government respectfully requests that the Court order Sharp detained pending the outcome of this case.

Sharp poses a danger to the community, as he is charged with possessing a firearm and extended magazine, which were recovered during a search of Sharp's vehicle. In the days leading up to the search, Sharp posted a video on a social media account where he brandished a firearm and extended magazine that appear to be the same firearm and extended magazine that law enforcement recovered. The firearm and extended magazine also appear to be the same firearm and magazine that Sharp brandished during an altercation in which Sharp threatened to shoot several other individuals, which is further discussed below. Accordingly, as set forth below, there is clear and convincing evidence that no condition, nor combination of conditions, can reasonably assure the safety of the community if Sharp is released and Sharp should remain detained pending trial. See Title 18, United States Code, Sections 3142(e) and (f).

Sharp is charged by Indictment, Criminal No. 24-789 (CCC) (the "Indictment"), with possession of a firearm and ammunition by a convicted felon,

in violation of Title 18, United States Code, Section 922(g)(1). The charge in the Indictment relates to items recovered during a judicially-authorized search of Sharp's residence and vehicle on July 12, 2024, during which law enforcement recovered from Sharp's vehicle a Beretta M9 semi-automatic handgun with a defaced serial number that was loaded with one round of ammunition and an extended magazine containing approximately twenty-four rounds of ammunition.

Prior to the firearm and extended magazine being recovered from Sharp's vehicle, law enforcement learned that Sharp posted a video brandishing what appears to be the same firearm and extended magazine and that he brandished what law enforcement believes to be the same firearm and extended magazine during a dispute at a gas station ("Gas Station-1"), which is in Bayonne, New Jersey. First, on or about July 4, 2024, law enforcement officers from the Bayonne Police Department responded to reports of an incident at Gas Station-1 and learned that during an altercation, Sharp brandished a firearm equipped with a extended magazine and threatened to shoot several other individuals who were present at Gas Station-1. Second, several days after the incident at Gas Station-1, Sharp posted a video on a social media account showing him dancing while holding a firearm equipped with an extended magazine.



Figure 1

Sharp also has a troubling criminal history and an apparent gang affiliation. He has repeatedly claimed to be associated with the Black Disciples, a street gang based in Chicago, Illinois, also known as “BD.” In videos posted on social media, Sharp repeatedly uses the phrases “on BD” and “on King David,” which are known references to the Black Disciples and their founder, David Barksdale. During an interview posted to social media, Sharp was asked if he was actually associated with the Black Disciples, or if it was just bluster for social media. He responded: “Famous Richard is a real BD.” He went on to claim that both his father and grandmother were associated with the Black Disciples.

In addition, Sharp’s extensive criminal history includes convictions for multiple crimes of violence and serious threats to a probation officer. Specifically, Sharp was convicted in Minnesota for an instance of simple robbery and an instance of aggravated robbery. According to the allegations in the underlying sworn complaints, in both instances Sharp physically assaulted victims before taking a cell phone from each victim and fleeing the scene. Sharp was also convicted in Minnesota for fourth degree assault of a correctional officer.

And perhaps most relevant to consideration of pre-trial release, Sharp was convicted in Minnesota of aggravated harassment or stalking in retaliation against a judicial officer. According to the allegations in the underlying sworn complaint, Sharp threatened a probation officer who was supervising him over the phone. Specifically, Sharp left a voicemail for the probation officer, which stated:

“On BD, bro, you a bitch, on the gang, you a real bitch. You fucking . . . pussy. You a bitch. On my life, you a bitch . . . Man, you bogus as hell, you bitch-ass dude. On my life. That’s why I hope a black guy fucks your daughter . . . pussy. That’s why a black guy fucking your wife You got bullied by black dudes in high school; that’s why you got the job you got . . . You fake-ass pig . . . On the gang, you a bitch . . . I hope your bitch-ass get nailed. I hope someone nail your bitch-ass, pussy.”

On top of these concerns, the evidence against Sharp is very strong. The charge in the Indictment stemmed from the execution of search warrants authorizing a search of Sharp’s residence and vehicle, and there is strong evidence tying Sharp to his vehicle generally and to the firearm and extended magazine that were recovered therein.

First, during the investigation, law enforcement saw Sharp utilize his vehicle before and after the above-described incident at Gas Station-1. Law enforcement also surveilled Sharp in the vehicle on numerous occasions,

including shortly before the commencement of the search when law enforcement saw Sharp park the vehicle in front of his residence and enter the residence.

Second, the firearm and extended magazine, which law enforcement recovered from his vehicle, appear to be the same firearm and extended magazine that he possessed at Gas Station-1 and on the video that he posted on social media. Finally, in lawfully-obtained phones calls involving Sharp, law enforcement learned that Sharp stated to the person with whom he was speaking, in substance and in part, that after a search his “crib,”¹ law enforcement recovered a gun and “my thirty.”² Although Sharp is, of course, presumed innocent at this stage of the proceeding, the evidence against him is very strong and supports detention.

Accordingly, there are no conditions, nor combination of conditions, that can reasonably assure the safety of the community. To the contrary, there is clear and convincing evidence that Sharp poses a real and significant threat to the community which cannot be overcome by any combination of release conditions. Therefore, Sharp should be detained pending trial.

Respectfully submitted,

VIKAS KHANNA
Acting United States Attorney



SEAN NADEL
Assistant United States Attorney

cc: Areeb Salim, Esq.
Karina Guzman, *U.S. Pretrial Services*

¹ Based on the information learned during the investigation, law enforcement believes that “crib” is a reference to Sharp’s residence that was searched.

² Based on the information learned during the investigation, law enforcement believes that “my thirty” is a reference to the extended magazine recovered from Sharp’s vehicle, which contained approximately twenty-four rounds of ammunition.